



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY
MAR 15 2022
RICK WARREN
COURT CLERK
109

BILLIE COLLINS, individually,
SONYA COLLINS, individually,

Plaintiff,

v.

KAMALJIT SINGH, individually, and FAST
CARGO TRANS INC.,

Defendants.

CJ-2022-1174
Case No. CJ-2022-

PETITION

COMES NOW, Plaintiffs, Billie Collins and Sonya Collins, and for their cause of action against Defendants, Kamaljit Singh and Fast Cargo Trans Inc., alleges and states as follows:

1. On or about February 4, 2022, at I-35 NB and 66 St. S NB Entrance, Kamaljit Singh was reckless, grossly negligent, negligent, negligent per se, and negligent in the operation of a motor vehicle while in the course and scope of employment and/or agency and/or joint mission for Fast Cargo Trans Inc., and, as a result, caused personal injuries to Plaintiffs.

2. Fast Cargo Trans Inc. is vicariously liable for damages caused by Kamaljit Singh. Fast Cargo Trans Inc. is also liable for its negligent entrustment of its vehicle to Kamaljit Singh, for its negligent hiring and training of Kamaljit Singh, and for negligently retaining Kamaljit Singh.

3. As a direct result of said negligence, Plaintiff sustained personal injuries resulting in the following elements of damage: both past and future pain and suffering, disability, medical expenses, both past and future loss of income, and loss of quality and enjoyment of life.

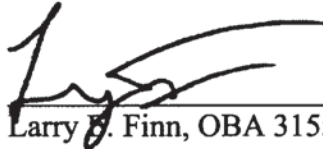
WHEREFORE, Plaintiff demands judgment against Defendants in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code

EXHIBIT

1

and for any and all further relief that Plaintiff may be entitled in law and equity, including punitive damages, if appropriate.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Larry E. Finn", is written over a horizontal line.

**ATTORNEY'S LIEN CLAIMED
JURY TRIAL DEMANDED**

Larry E. Finn, OBA 31551
PARRISH DEVAUGHN, PLLC
7 Mickey Mantle, Second Floor
Oklahoma City, OK 73104
405-444-4444
405-232-0058 (f)
Larry@parrishdevaughn.com
Attorneys for Plaintiff